

RECEIVED

AUG 04 2016

CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTAUNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Aida SHYEF Al-Kadi

Plaintiff(s),

16cv2642 JRT/JSM

vs.

Case No. _____
(To be assigned by Clerk of District Court)Ramsey County
Ramsey County Sheriff's Dept

DEMAND FOR JURY TRIAL

YES ☒NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in
this lawsuit. Please attach additional sheets
if necessary).COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name Aida Al-Kadi
Street Address 3365 Alabama Ave
County, City St. Louis Park, MN
State & Zip Code MN, 55416
Telephone Number 612-532-1555

SCANNED

AUG 05 2016

U.S. DISTRICT COURT ST. PAUL

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name *Ramsey County*
Street Address *345 Wabasha St Suite 120*
County, City *St Paul - (Ramsey County)*
State & Zip Code *55102*

b. Defendant No. 2 *Ramsey County Sheriff's Department*

Name
Street Address *1411 Paul Kirkwood Dr.*
County, City *Arden Hills (Ramsey County)*
State & Zip Code *MN 55112*

c. Defendant No. 3

Name
Street Address
County, City
State & Zip Code

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

8:56 Religious Discrimination

7:75 Conduct infringing freedom of religion

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph

5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? *(check all that apply)*

☒ Defendant(s) reside in Minnesota ☐ Facts alleged below primarily occurred in Minnesota

☐ Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

Seeking Compensation 50.000,00

Signed this 4th day of August

Signature of Plaintiff Ant S. Al-Kadi

Mailing Address 3365 Alabama Ave
St. Louis Park, MN
55416

Telephone Number 612-532-1555

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

I am a Muslim and wear a hijab or headscarf and some call it a (burka) I practice the faith of Islam I am a Muslim.

I had a minor traffic ticket that was about three years old back in 2013; I set up a date to try to pay the fee, but because of my daughter being ill I missed my court date, so I turned my self.

While I was walking through the entrance of the police department, an officer made eye contact, I was confronted by that police officer of St. Paul Police Department, I requested right there and then I need to take off my hijab, in front of all the people in the lobby, and officers, I had no problem obeying the request, but wanted to have a private area where no men were present, but that didn't happen.

I was then handcuffed and yanked into a room where I was required to remove my hijab in front of male officers. I requested only female's officers to be present, but I was refused. I was also required to remove my street clothing my outer cover that is called an Abiya(I had on a sleeveless shirt and pants under my abiya) and I was standing there in front of male officers. My arms, hair and neck areas that pursuant to my deeply held religious beliefs, these areas should not have been seen by any unrelated males. I was also frisked in front of male officers. It got worse as the day went on.

When I objected the male officers I was also threatened and told that if I don't obey the request, I would be put underground for individuals who don't follow orders.

When all the time to go home, I was given all my clothing and my hijab and put in a room with four other females and told to get dressed, I requested a private area, for religious reason I was not allowed to undress in front of other females, that request was denied.

CHARGE OF DISCRIMINATION

8:56 RELIGIOUS DISCRIMINATION

7:75 CONDUCT INFRINGING FREEDOM OF RELIGION

1. Aida Al-Kadi was not given the right of freedom of religion that is required by law
2. Aida Al-Kadi I was ^{not given} my religious freedom where not accommodated
3. I Aida Al-Kadi was treated with cruelty, based on religious intolerance by a public employee
4. I Aida Al-Kadi when forced to wear a bed sheet and I was mocked by staff

CHARGE OF DISCRIMINATION

8:56 RELIGIOUS DISCRIMINATION

7:75 CONDUCT INFRINGING FREEDOM OF RELIGION

1.

I AIDA AL-KADI WAS ARRESTED FOR A MINOR TRAFFICE VIOLATION AND PLACED IN THE RAMSEY COUNTY DETENTION CENTER ON AUG 14-15, 2013. THE RAMSEY COUNTY DETENTION CENTER VIOLATED MY RIGHTS BY FAILING TO PROVIDE REASONABLE ACCOMODATION OF RELIGIOUS DRESS. I AM A MUSLIM AND WEAR A RELGIOUS SCARF AND DRESS. I REQUESTED THE RIGHT TO WEAR MY RELIGIOUS HEAD SCARF (HIJAB) AND RELIGIOUS DRESS (ABAYA).

THE POLICE OFFICER ATTEMPTED TO PULL MY HEAD SCARF INFRONT OF MALE GUARDS. I WAS WILLING TO COMPLY BUT JUST REQUESTED THAT I HAVE MY HIJAB REMOVED ONLY IN THE PRESENTS OF FEMALE POLICES OFFICERS, I WAS NOT ACCOMATEDE. I WAS TREATED DISRESPECTFULLY, AFTER I REQUESTED THE ACCOMADATIONS. THE COUNTY ALSO TOOK A BOOKING PHOTO WHILE I WAS IN THE DENTENTION CENTER AND WITHOUT A HEAD COVER.

IN ADDITION I WAS FORCED TO REMOVE MY SCARF AND ABIYA INFRONT OF MALE EMPOLYEES WHICH WAS VERY UPSETTING TO ME AS A MUSLIM FEMALE THIS CONSTITUES AN UNFAIR AND DISCRIMATORY TREATMENT AND VIOLATION OF MINNESOTA HUMAN RIGHTS, THE POLICY TO SECURE FOR A PERSON THE RIGHTS OF FREEDOM FROM DISCRIMINATION.

2.

THE ACTION OF THE RAMSEY COUNTY EMPLOYEES AT THE COUNTY DETENTION CENTER VIOLATED THE MINNESOTA HUMAN RIGHTS ACT SECTION 363A.02 WHICH STATES THAT IT IS THE PULBIC POLICE OF THIS STATE TO SECURE FOR PERSONS IN THIS STATE, FREEMDOM FROM DISCRIMINATION: IN PUBIC SERVICE BECAUSE OF RACE, COLOR, CREED, RELIGION, NATIONAL ORGIN, SEX, MARITAL STATUS, DISABILITY, SEXUAL ORIENTATION, AND STATUS WITH REGARD TO PUBLIC SERVICE.

I AIDA AL-KADI WAS THAN AGAIN ON THE SAME DAY BY A DIFFERENT POLICE OFFICER AT A DIFFERNET TIME, MY HIJAB AGAIN WAS REMOVED THIS TIME IT WAS YANKED AND I WAS WAIVED A WHITE BED SHEET, THE SHEET WAS WAIVED INFRONT OF ME AND THAN THROWN AT ME. ONCE MY OWN HIJAB WAS YANKED OFF. MY HEAD WAS BARE WITHOUT MY COVERING.

I WAS THAN PLACED IN ISOLATION, I WAS TOLD THAT MY HIJAB WAS CONSIDER A WEAPON AND CAN DO HARM AND THAT I ONLY HAD ONCE CHOICE AND THAN I WAS PLACED IN ISOLATION FOR TWO HOURS IN A METAL CAGE.